

Thu, Jun 12, 2008 at 10:49 AM

Deborah MartinNorcross <dmnorcross@martinnorcross.com>

To: chidieze@yahoo.com

Cc: "numoh@umohlaw.com" <numoh@umohlaw.com>, "Harold Derschowitz (x263)"

<HDERSCHOWITZ@lskdnylaw.com>

Bcc: dave.milani@plusone.com

Dear Mr. Eze:

Thank you for assuming an active role in this litigation. I write to confirm the items to which we agreed in yesterday's conference call.

You will review Plaintiff's responses to all of Defendants' written discovery requests, as well as our deficiency letters, and provide complete and accurate supplementation by facsimile and/or by e-mail by no later than 5:00 p.m. on Monday, June 16. You also will hand-deliver hard copies of the supplementation to Mr. Derschowitz' office at 120 Broadway and to my office at 110 Wall Street by the agreed upon date and time.

You will produce Ms. Mann for her deposition by Plus One on June 24, and by Trump on June 30. You understand that, given the June 30 discovery cut-off, there can be no further adjournments or unilateral cancellations.

Counsel for both sets of defendants will discuss your settlement offer with our respective principals and each other, and contact you next week with a response.

Thank you again.

Deborah Martin Norcross

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chidi eze <chidieze@yahoo.com>

Thu, Jun 12, 2008 at 1:22 PM

Reply-To: chidieze@yahoo.com

To: Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Dear Mr. Martin Norcross,

Your understanding of our telephone conversation is just fine. Once again, thank you for the courtesies

Sincerely,

Chidi Eze.

— On Thu, 12/6/08, Deborah MartinNorcross <dmnorcross@martinnorcross.com> wrote: